

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 1:11-CR-161-1
)	
JOHNNY REID EDWARDS,)	
)	
Defendant.)	
_____)	

MOTION TO SEAL

Johnny Reid Edwards, through his counsel, pursuant to LCrR 6.1 hereby moves to seal his Memorandum in Support of Motion to Dismiss the Indictment Due to Grand Jury Bias, Interference with the Independence of the Grand Jury and Flawed Grand Jury Instructions filed in support of his Motion to Dismiss No. 3. The grounds for this Motion are that the filing contains either reference to or materials obtained from the grand jury transcripts produced to counsel by the government.

Respectfully submitted this 6th day of September, 2011.

/s/ James P. Cooney III
James P. Cooney III, N.C. Bar # 12140
jcooney@wcsr.com
WOMBLE CARLYLE SANDRIDGE & RICE, PLLC
One Wells Fargo Center
301 S. College Street, Suite 3500
Charlotte, NC 28202-6037
(704) 331-4980 (phone)
(704) 338-7838 (fax)

/s/ Abbe David Lowell
Abbe David Lowell, Admitted *pro hac vice*
ADLowell@Chadbourn.com
Christopher D. Man, Admitted *pro hac vice*
CMan@Chadbourn.com
CHADBOURNE & PARKE LLP
1200 New Hampshire Ave., NW
Washington, DC 20036
(202) 974-5600 (phone)
(202) 974-5602 (fax)

/s/ Wade M. Smith

Wade M. Smith, N.C. Bar # 4075

THARRINGTON SMITH LLP

209 Fayetteville Street Mall

Raleigh, NC 27602

Email: WSmith@tharringtonsmith.com

(919) 821-4711 (phone)

(919) 829-1583 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2011, I electronically filed the foregoing **MOTION TO SEAL** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Brian Scott Meyers
U.S. Attorney's Office – EDNC
Terry Sanford Federal Building
310 New Bern Avenue, Suite 800
Raleigh, NC 27601-1461
Telephone: (919) 856-4530
Fax: (919) 856-4487
Email: brian.s.meyers@usdoj.gov

David V. Harbach
U.S. Department of Justice
Public Integrity Section
1400 New York Avenue, NW, Suite 1800
Washington, DC 20005
Telephone: (202) 262-7597
Fax: (202) 514-3003
Email: david.harbach@usdoj.gov

Jeffrey E. Tsai
U.S. Department of Justice
Public Integrity Section
1400 New York Avenue, N.W., Suite 1800
Washington, DC 20005
Telephone: (202) 307-0933
Fax: (202) 514-3003
Email: jeffrey.tsai@usdoj.gov

Robert J. Higdon
U.S. Attorney's Office – EDNC
Terry Sanford Federal Building
310 New Bern Avenue, Suite 800
Raleigh, NC 27601-1461
Telephone: (919) 856-4530
Fax: (919) 856-4487
Email: bobby.higdon@usdoj.gov

/s/ James P. Cooney III

James P. Cooney III (NCSB # 12140)
Womble Carlyle Sandridge & Rice, PLLC
One Wells Fargo Center
Suite 3500, 301 South College Street
Charlotte, NC 28202
Telephone: (704) 331-4980
Email: jcooney@wcsr.com

Attorney for Defendant

Date: September 6, 2011